

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

LISA CUEVAS,  
*Individually and on behalf of all others  
similarly situated,*

*Plaintiffs,*

v.

SONY PICTURES ENTERTAINMENT,  
INC.,  
d/b/a CRUNCHYROLL

*Defendant.*

**Case No:** 1:22-cv-04858

**Judge:** Sara L. Ellis

**JURY TRIAL REQUESTED**

**PLAINTIFF’S CONSENT MOTION FOR LEAVE TO  
FILE SECOND AMENDED COMPLAINT**

Pursuant to FED. R. CIV. P. 15(a)(2), Plaintiff Lisa Cuevas, by and through her counsel, respectfully moves this Court for leave to file a Second Amended Class Action Complaint. In support of this motion, Plaintiff states as follows:

1. Pursuant to the Federal Rule of Civil Procedure 15(a)(2), “a party may amend its pleading only with the opposing party’s written consent or the Court’s leave. The Court should freely give leave when justice so requires.” FED. R. CIV. P. 15(a)(2).
2. Plaintiff filed the initial Class Action Complaint in this matter on September 8, 2022, and sought leave to file a First Amended Complaint, which substituted Defendant Sony Pictures Entertainment, Inc. as the operative Defendant in this matter.
3. On October 20, 2022, the Court granted Plaintiff’s motion for leave, and on October 27, 2022 Plaintiff filed her First Amended Complaint.

4. Thereafter, Defendant's counsel entered appearances, a waiver of service was executed, and the Parties entered into a briefing schedule for Defendant to file a motion to dismiss.

5. Plaintiff seeks leave to amend to substitute two new Plaintiff representatives – Salvador Beltran, Jr. and Eli Gross – as the named plaintiffs and putative class representatives in this matter.

6. Defendant has consented to this motion in writing via email to Plaintiff's counsel.

7. Defendant reserves its rights to oppose, object to, and move to dismiss or to strike the proposed Second Amended Complaint, or portions thereof, including with respect to the sufficiency of standing or any claims to be brought by the named plaintiffs.

8. As such, for the foregoing reasons, Plaintiff respectfully requests this Court grant this motion and allow Plaintiff leave to file the proposed Second Amended Complaint.

Dated: January 31, 2023

By: /s/ Brandon M. Wise

Brandon M. Wise – IL Bar # 6319580

Adam Florek – IL Bar # 6320615

**PEIFFER WOLF CARR**

**KANE CONWAY & WISE, LLP**

73 W. Monroe, 5th Floor

Chicago, IL 60604

T: 312-444-0734

[bwise@peifferwolf.com](mailto:bwise@peifferwolf.com)

[aflorek@peifferwolf.com](mailto:aflorek@peifferwolf.com)

Patrick Muench

**BAILEY & GLASSER LLP**

318 W. Adams St., Ste. 1512

Chicago, IL 60606

T: 312.500.8680

[pmuench@baileyglasser.com](mailto:pmuench@baileyglasser.com)

COUNSEL FOR THE PLAINTIFF  
AND THE PUTATIVE CLASS

By: /s/ Rachel Agius (w/ consent)  
Rachel Agius  
William F. Farley  
HOLLAND & KNIGHT LLP  
150 North Riverside Plaza, Ste. 2700  
Chicago, Illinois 60606  
312-263-3600  
William.Farley@hklaw.com  
Rachel.Agius@hklaw.com

Mark S. Melodia (*pro hac vice*)  
HOLLAND & KNIGHT LLP  
31 West 52nd Street, FL 12  
New York, NY 10019  
Mark.Melodia@hklaw.com

COUNSEL FOR DEFENDANT

#### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing document was filed with the Clerk of the Court using the CM/ECF system, which will provide notice and allow access to all counsel of record.

/s/ Brandon M. Wise